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## In The Matter Of:

James H. Gorbey, Jr. v. Ashland Construction Co., et al.

Vincent Rizzo
December 30, 2004

B&R Services for Professionals, Inc. 235 S. 13th Street Philadelphia, PA 19107 (215) 546-7400 FAX (215) 985-0169

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[1] [2] [3] [4]	residential, which I would have to check on them records.  Q. My question is do you believe you have records that would reflect your Pennsylvania	[1 [2 [3	Pennsylvania, where specifically?  A. I mean, we did a couple, actually my brother may have done a little bit up there for homeowners, a couple small jobs for them.
[4] [5] [6] [7] [8] [9] [10] [11] [12] [13] [14] [15] [16] [17] [19] [20] (21]	clients?  A. I don't understand that question.  MR. SMALL: He doesn't understand, Matt.  BY MR. CASEY:  Q. Do you keep records, sir, that if one were to search, one would be able to determine precisely those clients of yours that hale from Pennsylvania?  A. If so, I mean, it's so small, I mean, I would not even know. Like I said, there's a very little bit amount of work we do in Pennsylvania.  Q. My question though, sir, is different than, I know you want to tell me it's a small amount. I just want to know, first very basically, do you believe that documents exist that would tell a person, searching for	[14] [15] [16] [17] [10] [11] [12] [13] [14] [15] [16] [17] [18] [19] [19] [19] [19] [19] [19] [19] [19	That's the extent of it.  Q. When did that occur?  A. I don't even know the dates what it would have been.  Q. Did you ever do work in Pennsylvania?  A. Small amounts.  Q. I know it's small amounts. My question is, if you would, just listen to my question.  My question at this point is, did you ever do work in Pennsylvania? The answer to that I assume is yes?  A. Correct.  Q. When did you last do work in the Commonwealth of Pennsylvania?  MR. SMALL: Matt, you want his best estimate?  BY MR. CASEY:  Q. Sure.
[23] [24]	documents, relating to Pennsylvania, precisely who your Pennsylvania clients are?	[24	

[1]	A. No, I doubt it. I mean I can, the only	[1]	Q. Where?
[2]	one I would be able to check would be my	(2)	A. Actually Lomax Carpet.
[3]	bookkeeper and see if she can go back that far	(3)	Q. Lomax Carpet in Philadelphia?
[4]	and whatever she could find into it, into my	[4]	A. In Philadelphia.
[5]	file.	[5]	Q. For whom were you doing work at Lomax
[6]	Q. What do you mean when you say go back	[6]	Carpet in Philadelphia?
[7]	that far?	(7)	A. Actually for, actually John Manger got a
[8]	A. I mean, go back a year and see if there	[8]	hold of me and said we need to do a little bit
(9)	are documents in there for Pennsylvania, but I	[9]	of work up in that area.
[10]	doubt there would even be, because there's such	[10]	Q. Who is that person, sir?
(11)	a little amount of work that was done.	[11]	A. He is actually Air Base Carpet's
[12]	Q. I will give you the opportunity now to	[12]	construction manager.
[13]	tell me, if you would, in more detail what you	1131	Q. Can you spell his last name?
[14]	mean when you say a little amount. Can you	[14]	A. MANGER.
[15]	give me a percentage of your business?	[15]	Q. Where does he work out of?
[16]	A. Less than one percent.	[16]	A. As far as if
[17]	Q. How much money do you believe your	[17]	Q. If you wanted to find him, where would
[18]	company has earned in gross receipts, not	(18)	you call?
[19]	profit, in gross receipts, from masonry work	[19]	A. Actually I would call Air Base Carpet in
[20]	done in the Commonwealth of Pennsylvania?	(20)	New Castle.
(21)	A. Gosh, four, maybe five thousand, if that	[21]	Q. And Mr. Manger, who to your
[22]	seven, maybe in that area, that's what the		understanding, works out of the New Castle
	amount would be.	[22]	building, called you and told you that he
[23]	uniount would be.	(23)	buttomy, cance you and told you that he

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Q. Where did your company do work in

[24]

wanted you to do some work at the Lomax Carpet

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